

EXHIBIT 3

Kry, Robert

From: Kry, Robert
Sent: Saturday, December 12, 2015 4:21 PM
To: 'Tarbutton, J. Scott'
Cc: WTC[mm@martinmcmahonlaw.com]; Nitz, Eric; 'William Fox'
Subject: RE: 03 MDL 1570 -- Dallah Avco

Scott:

We have no objection to your request for an extension of time.

We do have objections to your meet and confer request. As you'll recall, Sean Carter wrote us on June 16, 2015, to request a meet and confer. We responded on June 17 proposing three different dates for the meet and confer and requesting that you provide specifics on the topics you wanted to discuss in advance of the call, which you had offered to do in any event. You failed to respond to our email, and we never heard from you again on the topic for almost six months.

The point of the meet and confer process is to see if the parties can resolve any concerns over objections prior to the filing of a motion to compel. We cannot do that unless you leave a reasonable amount of time following the meet and confer for us to conduct any follow-up searches that we might agree to perform. As I'm sure you can appreciate, locating documents from our client in Jeddah takes a substantial amount of time.

We believe that your failure to respond to our June 17 email for almost six months has compromised the meet and confer process and is a sufficient reason, by itself, why our client should not have to conduct any further document searches.

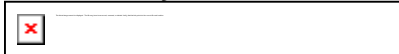
Subject to the foregoing objections, I have conflicting obligations the week of January 4th and the first few days of the following week, but we are available for a call on either January 14th or 15th. Please let me know what time is convenient for you. Please also send us the specific topics and documents you want to discuss as contemplated by your June 16 email.

To avoid any potential confusion over our position, please delete the phrase "and a mutual desire among the parties to provide additional time for the meet-and-confer process," from your letter. Otherwise we have no objection to the form of the request.

Best regards,

Robert

Robert K. Kry



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From: Tarbutton, J. Scott [<mailto:STarbutton@cozen.com>]
Sent: Friday, December 11, 2015 6:56 AM
To: WTC[mm@martinmcmahonlaw.com]; Kry, Robert
Subject: 03 MDL 1570 -- Dallah Avco

Martin and Robert,

I write to seek your consent to an extension of the deadline for plaintiffs to file their motion to compel as to Dallah Avco, which is currently due December 18. The extension is needed as a result of holiday travel schedules for some on the plaintiffs' side, but additionally believe the extension will provide us with some more time to engage in the meet-and-confer process and discuss various issues relating to your client's document productions. On a personal note, I have unfortunately been managing a family health emergency over the past two weeks which has not allowed me to focus more of my time on these issues, and thus would appreciate the extension. With your consent, I would like to move the deadline to file plaintiffs' motion to January 22, 2016, and also suggest we set aside some time to conduct a meet-and-confer during the weeks of January 4th or January 11th if you are available. In the event you agree to the extension, I am attaching a draft letter to the court for your review.

Thanks for your consideration.

Scott



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